

Kyle Pietrzak (*Admitted Pro Hac Vice*)
kpietrzak@qslwm.com
QUILLING, SELANDER, LOWNDS,
WINSLETT & MOSER, P.C.
6900 N. Dallas Parkway, Suite 800
Plano, Texas 75024
(214) 560-5460 / Fax: (214) 871-2111

Sarai L. Thornton (Bar No. 11067)
brigo@skanemills.com
SKANE MILLS LLP
1120 Town Center Drive, Suite 200
Las Vegas, Nevada 89144
(702) 363-2535 / Fax: (702) 363-2534
Counsel for Defendant Trans Union LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

WILLIAM H. BALL,

Plaintiff,

v.

TRANSUNION,

Defendant.

Case No. 2:23-cv-01816-JAD-NJK

**UNOPPOSED MOTION TO LIFT STAY
AND EXTEND DISCOVERY
DEADLINES AND CONTINUE TRIAL
(SECOND REQUEST)**

Defendant Trans Union LLC (“Trans Union”) hereby moves to extend all remaining deadlines set forth in the Order Granting Unopposed Motion to Extend Discovery Deadlines entered by this Court on April 12, 2024, (Dkt. No. 20), and stayed by this Court pending the Mandatory Settlement Conference, which was held on August 10, 2024. (Dkt. No. 23), as follows:

1. On November 6, 2023, Plaintiff filed his Complaint against Defendant Trans Union (Dkt. No. 1).

2. On June 5, 2024, the Parties submitted a Joint Motion for Referral to Magistrate for a Settlement Conference and a Stay of Pretrial Deadlines. (Dkt. No. 22) Therein, the parties jointly requested that “upon termination of the settlement conference, if the case remains

unresolved, the parties request that the Court enter an updated Scheduling Order, resetting the completion of discovery within sixty-days (60) days and all pretrial deadlines to be moved forward accordingly.” *See Id.* at ¶ 5.

3. On June 6, 2024, the Court entered a Minute Order in Chambers granting the Parties Motion for Referral to Magistrate Judge for Settlement Conference and further ordered that “the discovery period and all other related pretrial deadlines are extended to 60 days after the settlement conference.” (Dkt. No. 23)

4. On June 7, 2024, the Court entered an Order Scheduling Settlement Conference for August 9, 2024. (Dkt. No. 25)

5. The Settlement Conference was held via videoconference on August 9, 2024, before Magistrate Judge Brenda Weksler, where no settlement was reached. (Dkt. No 26)

6. Following the Settlement Conference, the parties have continued settlement discussions, but now wish to lift the stay and resume discovery.

7. On September 5, 2024, counsel for Trans Union met and conferred with Plaintiff via telephone regarding a request to lift the stay on discovery and to issue an Amended Scheduling Order as set outlined below. Plaintiff does not oppose this request.

8. The current deadlines (stayed) are as follows:

Discovery Cut-off	08/02/2024
-------------------	-------------------

Deadline to File Dispositive Motions	09/02/2024
--------------------------------------	-------------------

Joint Proposed Pre-Trial Order	10/02/2024, or 30 days after resolution of dispositive motions
--------------------------------	---

9. The parties request adoption of the following deadlines:

Discovery Cut-off	11/11/2024
-------------------	-------------------

Deadline to File Dispositive Motions	12/16/2024
--------------------------------------	-------------------

Joint Proposed Pre-Trial Order	01/15/2025, or 30 days after resolution of dispositive motions
--------------------------------	---

1 10. Good cause exists for the requested extension, because the proposed amended
2 schedule aligns with what the parties contemplated when requesting a stay of discovery pending
3 the settlement conference.

4 11. The requested extension is not sought for the purpose of delay.

5 12. The additional time is necessary and will allow the Parties to complete fact
6 discovery, including depositions and acquiring all relevant documents, as well as resolving any
7 outstanding discovery issues.

8 13. No party will be prejudiced by granting this request as Plaintiff does not oppose
9 Trans Unions' request to extend the deadlines. Furthermore, Trans Union believes that allowing
10 the extension will promote judicial economy.

11 14. This is the second request for an extension of the discovery deadlines.

12 WHEREFORE, Defendant Trans Union LLC respectfully requests this Honorable Court
13 (1) extend discovery in the present matter as set forth above; and (2) reissue a new Scheduling
14 Order to reflect the requested extension.

15
16 DATED: September 9, 2024

17 /s/ Kyle Pietrzak

18 Kyle Pietrzak

19 *Admitted Pro Hac Vice*

20 kpietrzak@qslwm.com

21 QUILLING, SELANDER, LOWNDS,

22 WINSLETT & MOSER, P.C.

23 6900 N. Dallas Parkway, Suite 800

Plano, Texas 75024

Tel: (214) 560-5460

Fax: (214) 871-2111

24 Sarai L. Thornton (Bar No. 11067)

25 brigo@skanemills.com

26 SKANE MILLS LLP

1120 Town Center Drive, Suite 200

Las Vegas, Nevada 89144

Tel: (702) 363-2535

Fax: (702) 363-2534

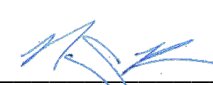
28 ***Counsel for Defendant Trans Union LLC***

IT IS SO ORDERED.

Dated: September 10, 2024

.

.


Nancy J. Koppe

United States Magistrate Judge